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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL ITS NOTICE
CLARIFYING VERTICAL RESOLUTION
FOR THE COURT**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal its Notice Clarifying Vertical Resolution for the Court (the “Administrative Motion”). The
8 Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Notice	Highlighted Portions	Waymo

11 3. The Notice contains references to Waymo’s trade secret information, which Waymo
12 seeks to seal. The references describe Waymo trade secrets with specificity, including their
13 description, development, and implementation.

14 4. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 24-15)
15 and are valuable as trade secrets to Waymo’s business (Dkt. 24-3). The public disclosure of this
16 information would give Waymo’s competitors access to descriptions of the functionality of Waymo’s
17 autonomous vehicle system. If such information were made public, I understand that Waymo’s
18 competitive standing would be significantly harmed.

19 5. Waymo’s request to seal is narrowly tailored to those portions of the Notice that merit
20 sealing.

22 I declare under penalty of perjury under the laws of the State of California that the foregoing is
23 true and correct, and that this declaration was executed in San Francisco, California, on May 21, 2017.

24 By /s/ Lindsay Cooper
25 Lindsay Cooper
26 Attorneys for WAYMO LLC
27
28

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven
Charles K. Verhoeven